



Sarah Jenkins <sarah@shjenkinslaw.com>

Motion for Remote Appearance by Ray & Associates VP Molly Schwarzhoff

8 messages

Sarah Jenkins <sarah@shjenkinslaw.com>
To: Cody Kees <ckees@bbpalaw.com>

Mon, Aug 23, 2021 at 2:55 PM

Cody,

Molly Schwarzhoff is Executive Vice President of Ray and Associates and oversaw the mechanics of PCSSD's 2018 search. She is listed as one of Dr. Warren's witnesses. The increase in Covid infections and deaths coupled with the fact that Ms. Schwarzhoff has a special needs child makes her appearance high-risk for her and her child. I am drafting a Motion requesting that she testify remotely. Let me know if you are willing to join this motion?

Sarah

Sarah Howard Jenkins, PLLC**Attorney at Law****P.O. Box 242694****Little Rock, AR 72223****(501) 406-0905****www.shjenkinslaw.com**

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Cody Kees <ckees@bbpalaw.com>
To: Sarah Jenkins <sarah@shjenkinslaw.com>

Mon, Aug 23, 2021 at 3:41 PM

Probably so. Just let me have a day to think thru. Would you agree to the same for Dr. Carl Davis? He lives abroad, as you know, I believe you both have talked before.

Cody Kees

Bequette, Billingsley & Kees, P.A.

Attorneys At Law

425 West Capitol Avenue | Suite 3200

Little Rock, Arkansas 72201-3469

T (501) 374-1107 | C (870) 550-3645

F (501) 374-5092 | ckees@bbpalaw.com**From:** Sarah Jenkins <sarah@shjenkinslaw.com>**Sent:** Monday, August 23, 2021 2:55:09 PM

To: Cody Kees <ckees@bbpalaw.com>

Subject: Motion for Remote Appearance by Ray & Associates VP Molly Schwarzhoff

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Sarah Jenkins <sarah@shjenkinslaw.com>
To: Cody Kees <ckees@bbpalaw.com>

Mon, Aug 23, 2021 at 4:15 PM

Most likely, I would agree; let me give it some thought. My understanding is that he lives abroad only part of the year.

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Cody Kees <ckees@bbpalaw.com>

To: Sarah Jenkins <sarah@shjenkinslaw.com>

Cc: Jay Bequette <jbequette@bbpalaw.com>

Mon, Aug 23, 2021 at 9:18 PM

Sarah-

We don't have a problem with Ms. Schwarzhoff appearing virtually if you can agree to Mr. Davis appearing virtually. I spoke with Mr. Davis recently and he will be living abroad (I think the DR is where he keeps a home) during the trial. You had also recently spoken with him.

You have indicated you have roughly 32 "will call" trial witnesses. Are you able to whittle that down? If you really plan to call in excess of 20 people we might advise the court to see if we have enough trial days and determine if the Court is going to place any limits on the case. Let me know. Thanks

Cody Kees

Bequette, Billingsley & Kees, P.A.

Attorneys At Law

8/25/2021

Sarah Howard Jenkins, PLLC Mail - Motion for Remote Appearance by Ray & Associates VP Molly Schwarzhoff

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[Quoted text hidden]

Sarah Jenkins <sarah@shjenkinslaw.com>
To: Cody Kees <ckees@bbpalaw.com>

Tue, Aug 24, 2021 at 8:49 AM

Cody,

Thanks! We don't have a problem with Dr. Davis appearing virtually. Let me know where he intends to report to give his testimony and we will address both witnesses in one joint motion later today. No, I don't intend to call all those listed. We chose Schwarzhoff from the three listed for Ray and Associates that we deemed qualified to speak to all issues that were important to us. I will be supplementing our pre-trial disclosures later this week.

Sarah
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Sarah Jenkins <sarah@shjenkinslaw.com>
To: Cody Kees <ckees@bbpalaw.com>

Wed, Aug 25, 2021 at 6:11 AM

Cody,

If I haven't heard from you by 10 a.m. today, I will simply file our motion for remote appearance as an uncontested one and support your later motion for Davis.

Sarah
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Attorney at Law
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8/25/2021

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Cody Kees <ckees@bbpalaw.com>

To: Sarah Jenkins <sarah@shjenkinslaw.com>

Wed, Aug 25, 2021 at 7:07 AM

I don't take issue with the request. Do you want to combine the two witnesses into on motion?

Cody Kees

Bequette, Billingsley & Kees, P.A.

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From: Sarah Jenkins <sarah@shjenkinslaw.com>

Sent: Wednesday, August 25, 2021 6:11:04 AM

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[Quoted text hidden]

Sarah Jenkins <sarah@shjenkinslaw.com>

To: Cody Kees <ckees@bbpalaw.com>

Wed, Aug 25, 2021 at 7:54 AM

No, let's keep them separate. I'll complete my draft as an unopposed motion. Thank you.

Sarah

Sarah Howard Jenkins, PLLC

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